Louisville Metro Air Pollution Control District
701 West Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137

Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-1146-20-F Plant ID: 1146

Effective Date: 09/22/2020 Expiration Date: 09/30/2025

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

Source: Preferred Marketing Solutions, Inc.
2001 Papa John's Blvd.
Louisville, KY 40299

Owner: Preferred Marketing Solutions, Inc.
2001 Papa John's Blvd.
Louisville, KY 40299

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve months and no later than ninety days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant: VOC
Tons/year: < 25

Application No.: See **Application and Related Documents** table.

Public Notice Date: 08/21/2020

Permit writer: Yiqiu Lin

Air Pollution Control Officer
9/22/2020

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Permit Revisions and Changes

Permit No.	Public Notice Date	Issue Date	Change Type	Description/Scope
197-0-F	07/01/2001	11/05/2001	Initial	Initial Permit Issuance
197-0-F (R1)	12/21/2003	01/23/2004	Revision	Incorporation of construction permit 340-02-C
O-1146-15-F	08/18/2015	09/21/2015	Renewal	Permit renewal; Incorporation of construction permits 34-06-C, 35-06-C and 137-10-C
O-1146-15-F (R1)	N/A	09/28/2015	Admin	Added more combustion sources <10 MMBtu/hr for PJ Food Services, Inc.
O-1146-20-F	08/21/2020	09/22/2020	Renewal	Permit renewal; removed pizza dough making operation (U2)[1] removed greenhouse gas requirements from General Conditions.

Construction Permit Summary

Permit No.	Issue Date	Description
177-00-C	01/02/2001	Heat-set web press, make King Press, with dryer
178-00-C	01/05/2001	Catalytic oxidizer, make Meg-Tec, model Quantum 020-070
340-02-C	01/09/2003	Heidelberg 6-color offset lithographic sheet-fed press, capacity 15,000 sheet/hr, model MOZ-74DI
34-06-C	06/14/2007	Goss International heat-set web lithographic printing press, model Sunday 2000, capacity 1854 fpm
35-06-C	06/14/2007	Eco-Cool thermal oxidizer, model TL 120-1200, 3,000 scfm
137-10-C [2]	12/20/2010	Flour, salt, and sugar processing equipment for Papa John's Food Service.

Application and Related Documents

[1] Preferred Marketing (1146) previously included printing service and Papa John's food service. The source requested to be permitted separately due to the fact that Papa Johns and Preferred Marketing have different management and their SIC code are different. The District approved the company's request.

[2] Papa John's food processing equipment is no longer permitted under Preferred Marketing.

Document Number	Date	Description
132391	02/20/2020	Reminder to company for FDEOOP renewal application due
132595	02/21/2020	Company response to request for site visit related to FEDOOP renewal application
133191	02/28/2020	APCD determination – permit Papa John Food Service separately
134379	03/10/2020	APCD remind company regarding FEDOOP renewal application
136228	03/31/2020	Correspondence related to FEDOOP renewal application
136240	04/01/2020	District follow up on 2020 FEDOOP renewal application
139199	04/30/2020	APCD reminder to company for FEDOOP renewal application
139235	04/30/2020	Correspondence regarding FEDOOP renewal application
140388	05/13/2020	Correspondence related to FEDOOP renewal
140416	05/14/2020	Correspondence regarding renewal application
141910	06/01/2020	Correspondence regarding FEDOOP renewal application
141951	06/02/2020	FEDOOP renewal application submitted
142934	06/15/2020	Approved plantwide PTE for 2020 FEDOOP renewal
164812 & 164824	8/18/2020 and 8/19/2020	Company comments on pre-draft permit and District response

Abbreviations and Acronyms

AP-42	- AP-42, *Compilation of Air Pollutant Emission Factors, published by U.S.EPA*
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO_x	- Nitrogen oxides
PM	- Particulate Matter
PM_{10}	- Particulate Matter less than 10 microns
$PM_{2.5}$	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO_2	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

Preamble

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

General Conditions

G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.

G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.

G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.

G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.

G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.

G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.

G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.

G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit. The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.

G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 10 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 25 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.

G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 100 tons per year of any regulated pollutant, including particulate matter, PM_{10}, $PM_{2.5}$, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.

G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.

G12. Unless specified elsewhere in this permit, the owner or operator shall submit semi-annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.

- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
- The signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

Reporting Period	**Report Due Date**
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

Regulation	Title
1.01	General Application of Regulations and Standards
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

Regulation	Title
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.15	Chemical Accident Prevention Provisions
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.

G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.

G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

Air Pollution Control District
701 W. Ormsby Avenue, Suite 303
Louisville, Kentucky 40203-3137

Plantwide Requirements

Facility Description

The source operates sheet-fed lithographic printing press, heat-set web lithographic printing press, and digital presses to provide printing service to Papa John's International and other organizations.

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
2.17	Federally Enforceable District Origin Operating Permits	All

DISTRICT ONLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
5.00	Definitions	1, 2

Plantwide Specific Conditions

S1. Standards
[Regulation 2.17, section 5.1]

a. VOC

i. The owner or operator shall not allow or cause the plant-wide emissions of VOC to equal or exceed 25 tons during any consecutive 12-month period. [3] [Regulation 2.17, section 5.1] [Regulation 5.00, section 1.13.5.1]

S2. Monitoring and Record Keeping
[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. VOC

i. The owner or operator shall, monthly, calculate and record the plantwide total emissions for VOC for each month and 12-consecutive month period.

S3. Reporting
[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. VOC

i. The owner or operator shall report the plantwide total emissions for VOC for each month and 12-consecutive month period.

[3] On 06/26/15, the source requested the limits of the criteria pollutant VOC < 25 tpy, total HAPs < 12.5 tpy, and largest single HAP < 5.0 tpy to qualify as FEDOOP STAR Exempt as defined by Regulation 5.00, section 1.13.5. According to an updated plantwide PTE evaluation in June 2020, the single HAP and combined HAP emissions cannot exceed the STAR exempt thresholds (12.5 tons for total HAPs and 5 tons for single HAP) uncontrolled. Therefore, the plantwide standards for total HAPs and single HAP are no longer required.

Emission Unit U1: Printing Operation

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	1 through 3

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
E1	6-color offset lithographic sheet-fed press, make Heidelberg, model MOZ-74DI, capacity 15,000 sheet/hr, printing size 20"x29"	2002	7.25	N/A	N/A
E3	4-color heatset web lithographic printing press, made Goss International, model Sunday 2000, capacity 1,854 fpm, printing width 38"	2006	7.25	C2	S2

Control Devices

Control ID	Description	Control Efficiency
C2	Eco-Cool Thermal Oxidizer, model TL 120-1200, 3000 scfm	98%

U1 Specific Conditions

S1. Standards

[Regulation 2.17, section 5.1]

a. VOC

i. For the sheet-fed press (E1), the owner or operator shall not allow or cause the VOC emissions to exceed 5 tons during any consecutive 12-month period.
[Regulation 7.25, section 3] [Permit 340-02-C, effective 12/06/2002]

ii. For the heatset web press (E3), the owner or operator shall not allow or the cause the VOC emissions to exceed 17 tons during any consecutive 12-month period.
[Regulation 7.25, section 3] [Permit 34-06-C, effective 6/30/2007]

iii. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate the heatset web press (E3) including the thermal oxidizer (C2) in a manner consistent with good air pollution control practice for minimizing emissions.
[Regulation 7.25, section 3] (BACT) [Regulation 1.05, section 5]

iv. The thermal oxidizer (C2) shall achieve a minimum VOC destruction efficiency of 98%. The combustion chamber temperature shall be maintained at 1400°F or greater at all times the heatset web press (E3) is in operation, unless otherwise established by subsequent stack test. The thermal oxidizer shall have a minimum residence time of 0.5 seconds.
[Regulation 7.25, section 3] (BACT)

v. The District has determined that compliance with the following VOC requirements represent Best Available Control Technology (BACT).[4]
[Regulation 7.25, section 3] (BACT) [Permit 340-02-C, effective 12/06/2002] [Permit 34-06-C, effective 6/30/2007]

Table 1. VOC requirements represent BACT

Raw Material	BACT Limit
(Sheet Fed Presses) Conventional Inks [5]	18% by weight VOC

[4] The District has determined that the use of raw materials that comply with the emission standards in Table 1 represents BACT level of control for the lithographic presses.

[5] Per EPA guidance document for Lithographic Printing and Letterpress Printing dated September 2006, the document defines varnishes as un-pigmented offset lithography inks, and therefore are to be included in the conventional ink category.

Raw Material	BACT Limit
(Sheet Fed Presses) Specialty Inks (including, but are not limited to, metallic, magnetic, fluorescent, and iridescent inks)	25% by weight VOC 10% of total ink usage
(Heat Set Presses) Inks	43% by weight VOC
(Sheet Fed Presses) Fountain Solution	Non-Vinyl: 5% by weight VOC as applied; or 8.5% by weight if Chilled Fountain Solution at 60°F max.; Vinyl or Plastic Sheets: 10% by weight as applied
(Heat Set Presses) Fountain Solution	1.6% by weight, if the fountain solution contains alcohol and is not chilled 3.0 % by weight, if the fountain solution contains alcohol and is chilled to 60°F or 5.0% by weight, if the fountain solution contains no alcohol and is not chilled, or 6.0% by weight, if the fountain solution contains no alcohol and is chilled to 60°F
(Sheet Fed and Heat Set Presses) Blanket Wash	70% by weight VOC as applied or vapor pressure ≤ 10 mm Hg at 68°F
(Sheet Fed and Heat Set Presses) Roller Wash	70% by weight VOC as applied or vapor pressure ≤ 10 mm Hg at 68°F
(Sheet Fed and Heat Set Presses) Water-based Coatings (Aqueous)	1.0 lb VOC/gal as applied

vi. The heatset web press (E3) shall be equipped with automatic blanket washers. The blanket wash solvent used on this press shall contain no more than 2.20 lb/gallon, less water, as applied.
[Regulation 7.25, section 3] (BACT) [Permit 34-06-C, effective 6/30/2007]

vii. The owner or operator of a lithographic press using automatic cleaning equipment (e.g. blanket washers) that mixes the cleaning solution at the point of application shall:

(1) Operate, maintain, and calibrate the automatic feed equipment to regulate the volume of each cleaning solvent and water (or other non-VOC), as mixed; and

(2) Preset the automatic feed equipment so that the consumption rates of the cleaning solvents and water (or other non-VOC), as-applied, comply with the applicable VOC content limits.

viii. The owner or operator shall maintain the temperature at or below 60°F for each fountain solution reservoir.
[Regulation 7.25, section 3] (BACT) [Permit 34-06-C, effective 6/30/2007]

ix. The owner or operator shall use the least amount of VOC containing materials needed for the job. [Regulation 7.25, section 3] (BACT)

x. The owner or operator shall store all VOC containing materials in closed containers when not in use. This includes materials such as inks, solvents, fountain solution, press cleaning materials, and waste materials including rags/wipes/paper used to clean press components.
[Regulation 7.25, section 3] (BACT)

xi. The owner or operator shall clean up all spills of any VOC containing materials no matter how small it is. If the spill is significant (i.e. more than one gallon), the owner or operator shall notify maintenance or professionals for assistance. [Regulation 7.25, section 3] (BACT)

S2. Monitoring and Record Keeping
[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. VOC

i. The owner or operator shall, monthly, monitor and maintain records of the name, quantity used, and VOC content for each of the following raw materials: inks, fountain solution concentrate, fountain solution additive, blanket wash, roller wash, press cleaning materials, and any other VOC containing material used during each calendar month and consecutive 12-month period.

ii. The owner or operator shall, monthly, calculate and record the total VOC emissions from the sheet-fed press (E1) for each month and 12-consecutive month period.

iii. The owner or operator shall, monthly, calculate and record the total VOC emissions from the heatset web press (E3) for each month and 12-consecutive month period.

iv. The owner or operator shall, monthly, maintain records that show the quantity (in pounds) of specialty inks used during each calendar month and

calculate the percentage of the total inks used that are classified as specialty inks as determined on a consecutive 12-month basis.

v. For automatic cleaning equipment (e.g. blanket washers), the owner or operator shall, monthly, maintain records that show the VOC content of the cleaning solvents (as applied) used in the automatic cleaning equipment.

vi. For each batch of blanket wash, roller wash, or other cleaning solution not prepared with automatic equipment, the VOC content of the cleaning solution (as applied) shall be determined by calculation. The calculation shall be kept in a batch log. The owner or operator shall document any additions of VOC or deviation from the standard cleaning solution makeup including the date and time of occurrence.

vii. To demonstrate compliance with the fountain solution temperature requirements, the owner or operator shall use a thermometer or other temperature detection device capable of reading to within 2.0 degrees to measure and record the temperature of each fountain solution reservoir once per day for each operating day and keep daily records of the temperature.

viii. For the thermal oxidizer (C2), a temperature monitoring device shall be installed in the combustion chamber or in the ductwork immediately downstream of the combustion chamber in a position before any substantial heat exchange occurs. The temperature readings shall be recorded at least once per day for each operating day.

ix. The owner or operator shall maintain daily records of any periods of time where the heatset web press (E3) was operating and the thermal oxidizer (C2) was not operating or a declaration that the control device was operated at all times that day when the process was operating.

x. If there is any time that the thermal oxidizer (C2) is bypassed or not in operation when the heatset web press (E3) is operating, then the owner or operator shall keep a record of the following for each bypass event:

(1) Date;

(2) Start time and stop time;

(3) Identification of the control device and process equipment;

(4) VOC emissions during the bypass;

(5) Summary of the cause or reason for each bypass event;

(6) Corrective action taken to minimize the extent or duration of the bypass event; and

(7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.

(8) If this event is due to an upset condition, you must report as specified in District regulation 1.07, section 4.

xi. The owner or operator shall maintain a copy of the Material Safety Data Sheet (MSDS) for each VOC containing raw material used at this plant.

S3. Reporting
[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. VOC

i. The owner or operator shall report the total VOC emissions from the sheet-fed press (E1) for each month and 12-consecutive month period.

ii. The owner or operator shall report the total VOC emissions from the heatset web press (E3) for each month and 12-consecutive month period.

iii. Identification of all periods of exceeding a VOC emission limit or standard specified, including the quantity of excess emissions. If no excess VOC emissions occur during a reporting period, the owner or operator shall submit a negative declaration.

iv. For the heatset web press (E3):

(1) Summary report identifying all periods of bypassing the thermal oxidizer (C3) while the heatset web press was in operation. The report shall include the date, the cause and duration (including the start and stop time) of each bypass event, the VOC a emissions during each bypass event, and description of any corrective action taken for each bypass event; and

(2) Identification of all periods when the inlet temperature to the thermal oxidizer was below the required temperature of while the heatset web press was in operation.

Insignificant Activities

Equipment	Qty.	PTE (ton/yr)	Regulation Basis
Ceiling mounted unit heaters, indirect-fired, natural gas-fired, capacity 8 MMBtu/hr total (see Unit IA1)	6	NOx = 3.44	Regulation 1.02, Appendix A
Digital printer #1, make Ricoh, model Pro C7110x (see Unit IA2)	1	VOC = 0.006	Regulation 1.02, section 1.38
Digital printer #2, make Ricoh, model Pro C7210x (see Unit IA2)	1	VOC = 0.006	Regulation 1.02, section 1.38
Platesetter #1, make Kodak, model Trendsetter TEE (see Unit IA2)	1	VOC = 0.047	Regulation 1.02, section 1.38
Platesetter #2, make Kodak, model Trendsetter TEE (see Unit IA2)	1	VOC = 0.047	Regulation 1.02, section 1.38
Cutter #1, make Polar/Mohr, model 115EMC-MON (see Unit IA3)	1	PM_{10} = 0.044	Regulation 1.02, section 1.38
Cutter #2, make Polar/Mohr, model 115ED (see Unit IA3)	1	PM_{10} = 0.044	Regulation 1.02, section 1.38
Cutter #3, make Polar/Mohr, model 137AT-XT (see Unit IA3)	1	PM_{10} = 0.044	Regulation 1.02, section 1.38
Cutter #4, make Polar/Mohr, model 78X (see Unit IA3)	1	PM_{10} = 0.044	Regulation 1.02, section 1.38
Bravo T stitch book binder, make Muller Martini, model 038D-0422 (see Unit IA3)	1	PM_{10} = 0.89	Regulation 1.02, section 1.38
Paper trim collector, make Hartzell, for collecting paper circles trimmed from web press (see Unit IA3)	1	PM_{10} = 0.51	Regulation 1.02, section 1.38

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.

2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.

3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15th.

4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.

5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.

6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.

Equipment Not Regulated

No.	Equipment	Determination Basis
1	Folder #1, make Heidelberg/Stahl, model RFH.66	No emissions
2	Folder #3, make Heidelberg/Stahl, model 1426C-C-3	No emissions
3	Folder #4, make Heidelberg/Stahl, model 1426D-C-3	No emissions
4	Power washer for cleaning, capacity 4.4 HP, gasoline powered	Trivial activity
5	Small shop welder for maintenance	Trivial activity

Emission Unit IA1: Indirect-fired Natural Gas-fired Heaters [6]

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
7.06	Standards of Performance for New Indirect Heat Exchangers	1 through 8

Equipment:

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
IE-1	Six (6) ceiling mounted unit heaters, indirect-fired, natural gas-fired, capacity 8 MMBtu/hr total	N/A	7.06	N/A	N/A

Control Devices

There are no control devices associated with this unit.

[6] Natural gas-fired boilers and water heaters are not subject to 40 CFR 63, Subpart JJJJJJ according to 40 CFR 63.11195(e) and (f).

IA1 Specific Conditions

S1. Standards
[Regulation 2.17, section 5.1]

a. Opacity

i. The owner or operator shall not cause to be discharged into the atmosphere from the heaters particulate matter emissions which exhibit greater than 20% opacity.[7] [Regulation 7.06, section 4.2]

b. PM

i. The owner or operator shall not cause to be discharged into the atmosphere from the heaters particulate matter in excess of 0.33 lb/MMBtu actual total heat input.[8] [Regulation 7.06, section 4.1.4]

c. SO_2

i. The owner or operator shall not cause to be discharged into the atmosphere from the heaters any gases which contain SO_2 in excess of 1.0 lb/MMBtu actual total heat input for combustion of gaseous fuels.[8] [Regulation 7.06, section 5.1.1]

S2. Monitoring and Record Keeping
[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

i. There are no monitoring or record keeping requirements for Opacity.

b. PM

i. There are no monitoring or record keeping requirements for PM.

c. SO_2

i. There are no monitoring or record keeping requirements for SO_2.

[7] The District has determined that the opacity standard will be met through the exclusive use of natural gas and propane.

[8] A one-time PM and SO_2 compliance demonstration has been performed for the boilers using AP-42 emission factors and combusting natural gas and propane, the regulatory emission standards should be met uncontrolled.

S3. Reporting
[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. Opacity

i. There are no routine reporting requirements for Opacity emission per Regulation 7.06.

b. PM

i. There are no routine reporting requirements for PM emissions per Regulation 7.06.

c. SO_2

i. There are no routine reporting requirements for SO_2 emissions per Regulation 7.06.

Emission Unit IA2: Miscellaneous VOC Emitting Equipment

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
7.25	Standard of Performance for New Sources Using Volatile Organic Compounds	All

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
IE-2	Digital printer #1, make Ricoh, model Pro C7110x	N/A	7.25	N/A	N/A
IE-3	Digital printer #2, make Ricoh, model Pro C7210x	N/A	7.25	N/A	N/A
IE-4	Platesetter #1, make Kodak, model Trendsetter TEE	N/A	7.25	N/A	N/A
IE-5	Platesetter #2, make Kodak, model Trendsetter TEE	N/A	7.25	N/A	N/A

Control Devices:

There are no control devices associated with this equipment.

IA2 Specific Conditions

S1. Standards
[Regulation 2.17, section 5.1]

a. VOC

i. See Plantwide emission unit.

ii. The owner or operator shall limit the total VOC emissions from any equipment subject to Regulation 7.25 to less than or equal to 5.0 tons during any consecutive 12-month period unless a BACT is approved.[9]
[Regulation 7.25, section 3.1]

S2. Monitoring and Record Keeping
[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. VOC

i. See Plantwide emission unit.

ii. The owner or operator shall, monthly, monitor and maintain records of the quantity used and VOC content of each VOC-containing material during each calendar month and consecutive 12-month period.[10]

iii. The owner or operator shall keep, monthly, records, including calculations, of all VOC emissions during each calendar month and consecutive 12-month period.[10]

S3. Reporting
[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition 12:

a. VOC

i. See Plantwide emission unit.

[9] It has been demonstrated that the total VOC emissions from any equipment subject to Regulation 7.25 (Non-BACT) should meet the standard uncontrolled.
[10] Instead of monitoring material usage, calculating and reporting VOC emissions for this unit, the owner or operator may choose to use potential to emission (PTE) values for VOC to calculate plantwide total VOC emissions.

Emission Unit IA3: Miscellaneous Particulate Matter Emitting Equipment

Applicable Regulations

FEDERALLY ENFORCEABLE REGULATIONS		
Regulation	**Title**	**Applicable Sections**
7.08	Standards of Performance for New Process Operations	1, 2, 3

Equipment

Emission Point	Description	Install Date	Applicable Regulations	Control ID	Release ID
IE-6	Cutter #1, make Polar/Mohr, model 115EMC-MON	N/A	7.08	N/A	N/A
IE-7	Cutter #2, make Polar/Mohr, model 115ED	N/A	7.08	N/A	N/A
IE-8	Cutter #3, make Polar/Mohr, model 137AT-XT	N/A	7.08	N/A	N/A
IE-9	Cutter #4, make Polar/Mohr, model 78X	N/A	7.08	N/A	N/A
IE-10	Bravo T stitch book binder, make Muller Martini, model 038D-0422	N/A	7.08	N/A	N/A
IE-11	Paper trim collector, make Hartzell, for collecting paper circles trimmed from web press	N/A	7.08	N/A	N/A

Control Devices:

There are no control devices associated with this equipment.

IA3 Specific Conditions

S1. Standards
[Regulation 2.17, section 5.1]

a. Opacity

i. The owner or operator shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]

b. PM

i. The owner or operator shall not allow or cause the PM emissions to exceed 2.34 lb/hr per piece of equipment, based on actual operating hours in a calendar day. [11] [Regulation 7.08, section 3.1.2]

S2. Monitoring and Record Keeping
[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

a. Opacity

i. There are no monitoring or record keeping requirements for this pollutant.

b. PM

i. There are no monitoring or record keeping requirements for this pollutant.

S3. Reporting
[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

a. Opacity

i. There are no reporting requirements for this pollutant.

b. PM

i. There are no reporting requirements for this pollutant.

[11] The potential uncontrolled PM emissions should meet the applicable lb/hr PM emission standard uncontrolled.

Attachment A – Calculation Methodologies and Emission Factors

Emissions are calculated by multiplying the throughput (ton, MMCF, gallons, etc) or hours of operation of the equipment by the appropriate emission factor and 1 minus any control device's efficiency. The following emission factors and calculation methodology shall be used unless other methods or emission factors are approved in writing by the District.

Unit ID	Emission Point Description	Pollutants	Emission Factors Unit	Uncontrolled Emission Factors	Emission Factor Sources	Notes
U1	Lithographic printing presses (E1, E3)	VOC/HAP	Mass balance method based on actual ink and solvent usage[1]			
	Thermal oxidizer NG combustion	VOC	lb/MMcf	5.5	AP-42, 1.4-2	PTE (total) = 0.133 tpy
IA1	Heaters (IE-1)	VOC	lb/MMcf	5.5	AP-42, 1.4-2	PTE (total) = 0.189 tpy
IA2	Digital printers (IE-2 and IE-3)	VOC	lb/hr	0.0015	Engineering Judgement	PTE (each) = 0.006 tpy
	Platesetters (IE-4 and IE-5)	VOC	lb/hr	0.011	Engineering Judgement	PTE (each) = 0.047 tpy
IA3	Cutters (IE-6 through IE-9)	PM	lb/hr	0.01	Engineering Judgement	PTE (each) = 0.044 tpy
	Book binder (IE-10)	PM	lb/hr	0.204	Engineering Judgement	PTE = 0.891 tpy
	Paper trim collector (IE-11)	PM	lb/hr	0.116	Engineering Judgement	PTE = 0.508 tpy

1. The emissions from lithographic presses are based on VOC and HAP content of the materials used. VOC emissions shall be calculated according to the following methodology, unless the District approves an alternative method in writing.

Off-set Lithography Sheet-fed Presses

E_{VOC} = $[(I_{VOC})(I_{Ret}) + (FS_{VOC}) + (BW_{VOC}) + (RW_{VOC}) + (C_{VOC}) + ((CS_{VOC})(R)]$

E_{VOC} = lb VOC Emissions

I_{VOC} = lb of sheet-fed ink used × weight % VOC in each ink

I_{Ret} = 0.05 (1 – 0.95, Ink oil retention factor for non-heatset inks)

FS_{VOC} = Qty of fountain solution used (gallons) × VOC content of fountain solution as applied (lb/gal)

BW_{VOC} = Qty of blanket wash used (gallons) × VOC content of blanket wash as applied (lb/gal)

RW_{VOC} = Qty of roller wash used (gallons) × VOC content of roller wash as applied (lb/gal)

C_{VOC} = Qty of coatings used (gallons) × VOC content of coating as applied (lb/gal)

CS_{VOC} = Qty of each cleanup solvent used (gallons) × VOC content as applied (lb/gal)

Off-set Lithography Heatset Presses

E_{VOC} = $[(I_{VOC})(I_{Ret})(C_{HI}) + (FS_{VOC})(C_{FS}) + (BW_{VOC})(C_{BW})]\times(1\text{-}CE) + [(0.05)(I_{VOC})(I_{Ret})] + [(0.30)(FS_{VOC})] + [(0.60)(BW_{VOC})] + Et_{VOC} + [(RC_{VOC})(R)]$

E_{VOC} = lb VOC Emissions

I_{VOC} = lb of heatset ink used × weight % VOC in each ink

I_{Ret} = 0.80 (1 – 0.2, Ink oil retention factor for heatset inks)

C_{HI} = 0.95 (Capture Efficiency for heatset inks)

FS_{VOC} = Qty of fountain solution used (gallons) × VOC content of fountain solution as applied (lb/gal)

C_{FS} = 0.70 (Capture Efficiency for fountain solution using alcohol substitutes)

BW_{VOC} = Qty of blanket wash used (gallons) × VOC content of blanket wash as applied (lb/gal)

C_{BW} = 0.40 (Capture Efficiency for blanket wash)

CE = Control Device Efficiency

Et_{VOC} = Qty of each used (gallons) × VOC content as applied (lb/gal)

RC_{VOC} = Qty of roller cleaner used (gallons) × VOC content as applied (lb/gal)

R = 1.0 or 0.50 (Fraction of cleanup solvent unrecovered)

An "R" factor of 0.50 (50 percent VOC credit) may be used for solvents (vapor pressure ≤ 5 mm Hg at 68°F) used to manually clean press components if the rags/wipes used to manually clean press components are stored in closed/sealed containers immediately after use and the company can document the quantity of solvent recovered.

Fee Comment

1. Preferred Marketing is required to pay the annual FEDOOP operating fee.